

**REMARKS**

By this Amendment, Applicant has added new claims 8-20. Thus, claims 1-20 are now pending in the application. It is respectfully submitted that pending claims 1-20 define patentable subject matter.

The present invention is a method of pre-sorting rules for filtering packets within a network to determine whether or not to reject a particular packet. Rather than considering all possible rules, the invention pre-sorts the rules such that only those rules that are applicable to the packet under consideration are considered. Since not all possible rules are considered, processing time is necessarily decreased.

According to an embodiment of the invention as defined in, for example, claim 10, first a packet is considered to determine the packet's source or destination information, and based on this information, the rules are pre-sorted to find only those rules that are applicable to the source/destination information. In this way the invention considers only those rules that may be applicable to the particular packet, thereby decreasing processing time.

Claims 1-7 were rejected under 35 USC 102(e) as being anticipated by Radia et al, U.S. Patent No. 5,848,233. Applicant respectfully traverses this rejection. As applied to the present more definite claims. By this Amendment, Applicant has amended claim 1 to clarify that the presorting of rules is based on packet information. Specifically, operation (e) in claim 1 has been amended to recite: "selecting at least one of the plurality of rules according to said value obtained by at least partially analyzing information in the packet in order to form at least one selected rule". Applicant respectfully submits that Radia does not anticipate independent claim 1

or any of the dependent claims 2-7 at least because Radia fails to select rules for filtering a packet based on a value obtained from at least partially analyzing information in the packet, as recited in claim 1. Radia et al does arguably teach presorting rules for filtering packets; however, Radia teaches presorting rules based on a particular user's login information. In fact, Radia refers to the various filter or rule profiles as "login profiles". See, col. 3, lines 18-20, and col. 7, lines 38-40. That is, the user itself serves as the profile id 402 for selecting a particular set of filtering profiles. See, col. 6, lines 5-8. In Radia, by the time a particular packet is examined, the filtering profiles or possible rules have already been selected or pre-sorted. Col. 7, lines 38-60. This is very different from the claimed invention.

In direct contrast, the method defined in claim 1 pre-sorts rules in a completely different way. Rather than using the user's login or other user information to select particular profiles or rules, the claimed invention examines information contained in a packet, and then using this packet information pre-sorts the applicable rules for that packet. As mentioned above, by the time Radia examines a particular packet, the set of profiles or rules have already been selected. Consequently, it is apparent that the claimed invention's method of examining packets to pre-sort filter rules provides a fundamentally different approach from the Radia method, which selects profiles or rules based on user information, not from packet information. Since Radia does not teach each and every limitation in claim 1 (i.e., Radia at least fails to teach operation (e) of selecting rules according to "said value", which value was obtained from examining packet information), Radia could not have anticipated claim 1 or dependent claims 2-7. Moreover,

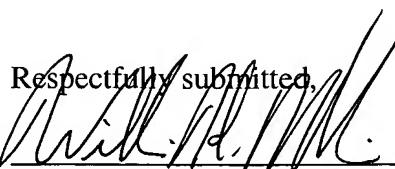
since Radia applies a fundamentally different approach from the claimed invention, it is clear that claim 1 defines patentable subject matter.

Applicant has herein added new independent claims 8 and 15. Independent claims 8 and 15 define similar subject matter to method claim 1, but claim 8 defines “an apparatus,” and claim 15 defines “a computer program.” A computer program is described, for example, on page 3 of the present application. Both independent claims 8 and 15 recite the feature of selecting rules according to a value obtained by analyzing information in the packet. Consequently, similar to claim 1, independent claims 8 and 15 define patentable subject matter. Claims 9-14 and claims 16-20 depend on claim 8 or 15 and therefore necessarily also define patentable subject matter.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

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Respectfully submitted,

  
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